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Attorneys for Defendant  
TESLA, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

DEAN SHEIKH, JOHN KELNER, TOM  
MILONE, DAURY LAMARCHE, DAN  
WHELAN, and MICHAEL VERDOLIN, on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

TESLA, INC. d/b/a TESLA MOTORS, INC., a  
Delaware corporation,

Defendant.

Case No. 5:17-cv-02193-BLF

**STIPULATION AND  
[PROPOSED] ORDER TO  
CONTINUE STAY OF CASE**

1 Plaintiffs Dean Sheikh, John Kelner, Tom Milone, Daury Lamarche, and Michael  
2 Verdolin (collectively “Plaintiffs”) and Defendant Tesla, Inc. (“Defendant”), through their  
3 undersigned counsel, hereby stipulate as follows:

4 WHEREAS on April 10, 2018, the Court continued a stay of the case until May 24, 2018  
5 to allow the parties time to complete discussions following a mediation and ordered the parties to  
6 update the Court on that date.

7 WHEREAS the parties have reached a proposed class settlement in this matter. Plaintiffs  
8 are prepared to file their motion for preliminary approval as soon as the Court is able to provide  
9 them with a hearing date as separately requested.

10 THEREFORE, subject to the approval of the Court, the parties agree and stipulate as  
11 follows: This matter shall be stayed pending completion of the settlement-approval process,  
12 unless and until the Court should order otherwise. All deadlines, including Defendant’s deadline  
13 to respond to Plaintiffs’ Second Amended Complaint, are vacated.

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15 IT IS SO STIPULATED.  
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1 Dated: May 24, 2018

MORRISON & FOERSTER LLP

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4 By: /s/ Penelope A. Preovolos  
Penelope A. Preovolos

5 Attorneys for Defendant  
6 TESLA, INC.

7 Dated: May 24, 2018

HAGENS BERMAN SOBOL SHAPIRO LLP

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9 By: /s/ Steve W. Berman  
10 Steve W. Berman (*pro hac vice*)  
11 Thomas E. Loeser (SBN 202724)  
Robert F. Lopez (*pro hac vice*)

12 Attorneys for Plaintiffs  
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**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(I)(3)**

I, Steve W. Berman, am the ECF User whose identification and password are being used to file this Joint Status Report. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all signatories have concurred in this filing.

Dated: May 24, 2018

By: s/ Steve W. Berman  
Steve W. Berman

**[PROPOSED] ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED** that this matter shall be stayed pending completion of the settlement-approval process, unless and until the Court should order otherwise. All deadlines, including Defendant's deadline to respond to Plaintiffs' Second Amended Complaint, are vacated

Dated: \_\_\_\_\_, 2018

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The Hon. Beth Labson Freeman  
United States District Judge